

UNITED STATES DISTRICT COURT

for the

District of _____

Division _____

US DISTRICT COURT
WESTERN DISTRICT ARKANSAS
FILED

MAY 23 2019

DOUGLAS F. YOUNG, Clerk
By _____
Deputy ClerkEdward Allan Watts & Lindsay Lopez
Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Sydney Ann Watts E.T. A.L.
Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

2:19-cv-2066

(to be filled in by the Clerk's Office)

Jury Trial: (check one)

☐

Yes

☒

No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Edward Allan Watts

Street Address

5900 Kinkead Ave. Apt. 431

City and County

Fort Smith, AR Sebastian

State and Zip Code

Arkansas 72903

Telephone Number

(479) 259-5776

E-mail Address

donkeymachi@icloud.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

I.

A. Plaintiff

Lindsay Lopez

5900 Kinkead Avenue Apt. 431

Fort Smith Sebastian

Arkansas 72903

479-259-5776

Defendant No. 1

Name

See Attached

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 2

Name

//

//

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 3

Name

//

//

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 4

Name

//

//

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

I.

B. Defendants

Sydney Watts

1408 E Couer d'Alene Avenue

Couer d'Alene Kootenai

Idaho 83814-4130

479-222-4462

Stuart Neil Watts

1408 E Couer d'Alene Avenue

Couer d'Alene Kootenai

Idaho 83814-4130

Brian Lee Watts

1408 E Couer d'Alene Avenue

Couer d'Alene Kootenai

Idaho 83814-4130

City of Fort Smith

Organization

623 Garrison Avenue

Fort Smith Sebastian

Arkansas 72901

479-785-2801

administration@fortsmithar.gov

Jarrard Copeland

C/O Greenwood Post Office

450 E Atlanta St

Greenwood Sebastian

Arkansas 72936

Kristopher Koelemay

Courts Building

901 South B Street

Fort Smith Sebastian

Arkansas 72901

479-783-8976

Daniel Shue

12th Judicial District

Prosecuting Attorney

Courts Building

901 South B Street

Fort Smith Sebastian

Arkansas 72901

479-783-8976

Houston Garner

Courts Building

901 South B Street

Fort Smith Sebastian

Arkansas 72901

479-783-8976

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11788 Doc Hall Road

Prairie Grove Washington

Arkansas 72753

479-846-2018

Dr. Christopher Barrick

University of Arkansas

5210 Grand Avenue

P.O. Box 3649

Fort Smith Sebastian

Arkansas 72913-3649

479-788-7000

Dr. Lee Krehbiel

University of Arkansas

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Dr. David L. Stevens

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479-788-7000

Beverly McClendon
University of Arkansas
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Fort Smith Sebastian
Arkansas 72913-3649
479-788-7000

Dr. Brad Sheriff
University of Arkansas
5210 Grand Avenue
P.O. Box 3649
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Arkansas 72913-3649
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SD Board of Regents
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605-773-3455

info@sdbor.edu

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Arkansas 72207

501-686-2500

Leslie Rutledge

323 Center Street

Suite 200

Little Rock Pulaski

Arkansas 72201

501-682-2007

oag@arkansasag.gov

Jacqueline Hopkins

U.S. Department of Justice

950 Pennsylvania Avenue, NW

Washington, DC 20530-0001

202-514-2000

Unknown Employees of the Western District of Arkansas US Attorney's Office

414 Parker Avenue

Fort Smith Sebastian

Arkansas 72901

479-783-5125

arw.web@usdoj.gov

Walmart Stores Inc.

702 Southwest 8th Street

Bentonville Benton

Arkansas 72716-8611

479-273-4000

info@walmart.com

Barnes & Noble Inc.

122 Fifth Avenue

New York New York

New York 10011

(800)962-6177

British Broadcasting Corporation

101 Wood Ln, White City

London W12 7FA

United Kingdom

+442087438000

News Corporation

1211 Avenue of the Americas

New York New York

New York 10036

(212) 416-3400

Western Arkansas Counseling Guidance

3111 S 70th St

Fort Smith Sebastian

Arkansas 72903

(479) 452-6650

Unknown FBI Employees

935 Pennsylvania Avenue, NW

Washington, D.C. 20535-0001

(202) 324-3000

Unknown Department of Justice Educational Opportunities Section Associates

950 Pennsylvania Avenue, NW

Washington, DC 20530-0001

(202) 514-4092

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

See Attached

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the
State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of
the State of *(name)* _____. Or is a citizen of
(foreign nation) _____.

II.

A.

42 USC 1983 Deprivation of Rights

Bivens

18 USC 1964 Civil Remedies

18 USC 1343 Wire Fraud

18 USC 1962 (c) Prohibited Practices

42 USC 1981 Equal Rights

42 USC 3631 Housing Discrimination

42 USC 2000 (d) Public Discrimination

15 USC 1125 Trademark Infringement

Ark 16-56-111 Breach of Contract (Watts)

Ark 16-56-111 Breach of Contract (Garner)

UCC 7-307 (c) (May 23, 2014)

UCC 7-307 (c) (January 11, 2017)

1st Amendment

4th Amendment

5th Amendment

8th Amendment

14th Amendment

b. If the defendant is a corporation

The defendant, *(name)*, is incorporated under
the laws of the State of *(name)*, and has its
principal place of business in the State of *(name)*.
Or is incorporated under the laws of *(foreign nation)*.
and has its principal place of business in *(name)*.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

See Attached \$1,572,629,763.07

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See Attached

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

III. Statement of Claim

The defendants, their subordinates, and others created an association in fact which perpetrated a pattern of racketeering and civil rights deprivations against the plaintiffs primarily through use of two corrupted enterprises, City of Fort Smith and State of Arkansas. The defendants themselves are otherwise employed by or represent at least ten entities known or interpreted as 6001 Bolton Road, City of Fort Smith, 12th Judicial District, State of Arkansas, United States Department of Justice, Barnes & Noble Incorporated, Walmart Stores Incorporated, British Broadcasting Corporation, News Corporation, and Federal Bureau of Investigation. The primary purposes of this association in fact were to discriminate, defraud, enable conversion, conceal criminal offenses, mitigate liability, absorb statutes of limitations, and retaliate against the plaintiffs for reporting crimes committed by Fort Smith police officers, 12th Judicial District Prosecuting Attorneys, and their associates. All involved have surrendered any potential immunity by acting in demonstrable bad faith.

This case file, containing approximately 35,000 words of text, 200 photos, seven audio recordings, and two videos is presented on an accompanying flash drive.

Relief

The plaintiffs never wanted to file this lawsuit. Back at 6001 Bolton Road, we ignored an astounding amount of harassment and discrimination that at times rose to the level of torture. All we wanted was a stable environment while pursuing education. When we peacefully confronted Sydney Watts about the abuse inflicted upon us, she involved law enforcement in an unlawful eviction which, as our evidence shows, caused a series of misdemeanors and felonies motivated by race, disability, and gender based discrimination in addition to breach of contract. When we reported these crimes to members of law enforcement further up the chain of command, rather than protect our rights, they engaged in fraud and intimidation. Nonetheless, we still did not want to file this lawsuit. The plaintiffs would have walked away, but these defendants would not let us. We tried continuing on about our lives, but members of law enforcement entered into an agreement with the University of Arkansas and others to begin a coercive investigation designed specifically for the purpose of discriminating further, intentionally causing us to fail, and engaging in cruel, unusual behavior without even the pretense of due process. As events within our case file unfolded, we begged and pleaded with law enforcement and the university to protect us against the assault, aggravated assault, sexual assault, fraud, and harassment we fell victim to these last five years. They refused, however, and during that refusal, it became clear how these crimes were actually being committed and capitalized on by agents of law enforcement as retaliation for reporting the hate crimes associated with our eviction. We never wanted to file this lawsuit, but no local, state, or federal agency will take action in our defense. The pattern of racketeering and civil rights violations committed against us has been extreme and severe. The following outlines damages to which we are entitled.

Tortious Interference with an Inheritance-

1/6 Value of Bolton Road * 3= \$90,000

Increased Expenses Due to Unplanned Change in Living Arrangements- \$34,168.58 * 3=
\$102,505.74

Lifetime Wage Differential Due to Loss of Education for Edward Allan Watts- \$559,728 * 3=
\$1,679,184

Lifetime Wage Differential Due to Loss of Education for Lindsay Lopez- $\$414,000 * 3 = \$1,242,000$

Lifetime Expenses related to treatment of the plaintiffs for Post Traumatic Stress Disorder- $\$1,296,000 * 3 = \$3,888,000$

The remainder of rent from January 2014- $\$162.38 * 3 = \487.14

Excess paid to Sydney during 2011- $\$1,250 * 3 = \$3,750$

Make Exact—Tuition Debt defrauded by UAFS- $\$4,700 * 3 = \$14,100$

Additional Loans Accrued Based on Action- $\$105,000 * 3 = \$315,000$

Total Compensatory Damages- $\$7,335,026.88$

Damage Related to Mental Anguish Intentionally Inflicted- $\$22,005,080.64$

Sub-Total- $\$29,340,107.52$

According to typical cases, punitive damages exceeding 4-10 times the amount of compensatory damages are considered a violation of due process. However, among other offenses, these defendants flagrantly violated the plaintiffs' due process rights and did so knowingly to conceal crimes based on their inappropriate affiliations. In doing so, they victimized the plaintiffs with crimes almost identical from the original complaint. As such, an appropriate penalty must be levied. In TXO Production Corp. vs. Alliance Resources Corp., the court system saw fit to exact punitive damages at a ratio of 526 to 1. Acknowledging that precedent, the plaintiffs in this case request punitive damages at a ratio of 52.6 to 1, an amount of \$1,543,289,655.552

Total- \$1,572,629,763.071

See Attached

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 5-23-19

Signature of Plaintiff

Printed Name of Plaintiff

[Signature]
Edward Allan Watts Lindsay Lopez

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address